

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :
: Plaintiff, :
: :
v. : :
: : Criminal Action No. 08-98-SLR
: :
STEVEN DINEEN, :
: :
Defendant. :
:

MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS

Defendant, Steven Dineen, by and through his undersigned counsel, Luis A. Ortiz, hereby moves the Court pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a) for an order enlarging the time within which pretrial motions may be filed. In support of this motion the Defendant submits as follows:

1. Pre-trial motions for this case are due by July 22, 2008. Discovery has been requested in this case and was received July 21, 2008. Defense counsel is in the process of reviewing discovery and conducting all necessary investigation.
2. Additionally, The government and the defense are exploring the possibility of a non-trial disposition of Mr. Dineen's case. Depending on the outcome of the negotiations between the government and the defense, the filing of pre-trial motions may not be necessary. In order to complete all negotiations and investigations in this matter the defense respectfully requests an additional 30 days in which to file any pre-trial motions.
3. Assistant United States Attorney, Geoffrey Grivner, counsel for the government, does not oppose the defense's request for an extension.

4. Mr. Dineen has no objection to the extension of time.
5. The defense agrees to waive, pursuant to the Speedy Trial Act, any additional time given in which to file pre-trial motions.

WHEREFORE, it is respectfully requested that the time for Defendant to file pre-trial motions be extended to anytime after July 22, 2008.

Respectfully Submitted,

/s/ Luis A. Ortiz
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Attorney for Defendant Steven Dineen

Dated: July 22, 2008

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: Plaintiff, :
: v. : Criminal Action No. 08-98-SLR
: STEVEN DINEEN, :
: Defendant.

ORDER

Having considered Defendant Dineen's Motion to Extend Time to File Pretrial Motions,
IT IS HEREBY ORDERED this _____ day of _____, _____, that Defendant
Dineen's pretrial motions shall be due on the _____ day of _____, 2008.

Honorable Sue L. Robinson
United States District Court